EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

David Goulding, Howard Salamon,)	
Robyn Goulding, and)	
John O'Shea.,)	Case No. 1:22-cv-05224
Plaintiffs,)	
V.)	Judge Sharon Johnson Coleman
)	
Mark Miller,)	
Defendant.)	

AFFIDAVIT OF HOWARD SALAMON

- I, Howard Salamon being first duly sworn on oath state that if called to testify in this matter, I would competently testify to the following facts based on personal knowledge, information, and belief, as follows:
 - 1. I was CEO of Capitol Capital Corporation ("CCC") on July 17, 2019.
- 2. On July 17, 2019, I signed a certain Agreement on behalf of CCC granting certain parties the right to receive proceeds from the sale of Indo Global Shares. I am aware that the Agreement was made part of the above captioned case as Dkt 14-1, Pages 14-17.
- 3. As CEO of CCC, I had the full power to authorize the Agreement and payment to parties to the Agreement.
- 4. As CEO of CCC, it was justifiable to pay the proceeds from the sale of Indo Global shares to the parties to the Agreement, in accordance with terms of the Agreement.
- 5. I remained CEO until August 12, 2019, whereupon I resigned and appointed David Goulding as CEO.
 - 6. At no time did I appoint Mark Miller as a Director or Chairman of the Board of CCC.
- 7. In 2019, I was the rightful owner of 3,800,000 shares of CCC and I am still the rightful owner of 3,800,000 shares of CCC.
 - 8. At no time did I transfer any of my shares of CCC to Mark Miller.

Further, your affiant sayeth naught.

, November 15, 2024

Howard Salamon

VERIFICATION BY CERTIFICATION

I, Howard Salamon, being first duly sworn on oath deposes and states that, under penalties as provided by law pursuant to 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies that she verily believes the same to be true.

Howard Manney, November 15, 2024

Howard Salamon